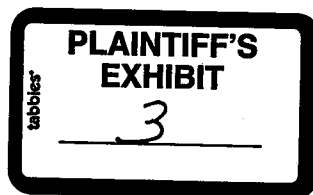


AFFIDAVIT OF JOANN STEVENSON

[illegible]

I, Joann Stevenson, hereby state the following:

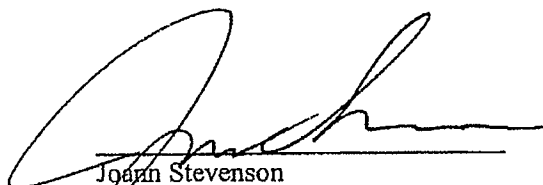
1. That I am an Assistant Attorney General in the Office of the Attorney General of the State of Oklahoma in its General Counsel Division and assigned counsel to the Oklahoma Conservation Commission (hereinafter "OCC" or the "Commission").
 2. That I, along with attorneys in the Environmental Division of the Office of the Attorney General instructed OCC staff in responding to the Poultry Integrator's Interrogatories and Requests for Production of Documents ("RFP") which were served on OCC.
 3. I, along with attorneys from our office's Environmental Division reviewed the RFP with staff from each division of OCC paragraph by paragraph and advised them to identify documents responsive to each paragraph and to assemble the documents in a central location to facilitate review by attorneys for the State of Oklahoma and review by counsel for the Poultry Integrators.
 4. The heads of each division of OCC then directed each the staff member for whom each was responsible for in a supervisory capacity to gather documents in accordance with the instructions given by our office and in accordance with the language of the RFP. OCC directed one staff person to manage the assembly of documents.
 5. OCC has been conducting water quality monitoring in the Illinois River since the 1980s. Accordingly, OCC possesses a large quantity of archived data from the monitoring program. In addition, OCC has done a number of projects in the Illinois River related to water quality. The RFP from the Poultry Integrators was broad in scope such that the information sought covered a significant amount Commission documents related to the Illinois River Watershed.
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6. A total of one-hundred and fourteen (114) boxes of hard copy records were produced by the Commission—the majority being from its Water Quality Division. Staff from the Water Quality Division spent three months searching, copying, and organizing the relevant documents. Two staff worked virtually full-time on the project while a third employee spent approximately half their time on the project. All Water Quality Division staff spent significant time reviewing their personal hard copy files for Illinois River Watershed information. (A more detailed documentation of Water Quality Division staff time was maintained.)
 7. Another example of staff time expended was time spent by OCC's Financial Management and Human Resources Division. This division provided three boxes of hard copy financial claims of individuals who had participated in conservation cost-share programs in the Illinois River Watershed. This required two staff to spend two full days pulling copies of claims from archives.



8. Commission staff conducted an exhaustive search of all agency hard copy records related to the Illinois River Watershed. Thousands of hours of staff time were involved. I believe that the agency made more than a good faith effort in providing the poultry industry with every responsive document that was sought in the request for documents.

9. Performing yet another comprehensive search, organization and review of the Commission files and produced responsive documents would take many more hours of staff time, keeping staff from their ordinary and customary duties and would clearly cause additional excessive disruption to the essential functions of the Commission.

FURTHER AFFIANT SAYETH NOT.


Joann Stevenson

Subscribed and sworn before me this 29th day of May, 2007.


NOTARY PUBLIC

My Commission expires 2/8/10.

